



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

July 23, 2013

Coeur d'Alene River Ranger District
Attn: Project Leader Lauren Goschke
2502 E. Sherman Avenue
Coeur d'Alene, Idaho 83814

Re: EPA Region 10 comments on the Beaver Creek Project Draft Environmental Impact Statement
(EPA Project Number: 13-0004-AFS).

Dear Ms. Goschke:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the proposed Beaver Creek Project on the Coeur d'Alene River Ranger District of the Idaho Panhandle National Forests in Shoshone County, Idaho. Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

In our February 25, 2013 scoping comments on the Beaver Creek Project, we indicated support for the Forests' efforts to meet many of the project's needs, especially ensuring diverse and sustainable forest stands and restoring water quality and aquatic habitats. The EIS carries these needs forward through Objective 1: Develop Resilient Forest Conditions, and Objective 3: Improved Water Quality and Aquatic Habitats. We support the action alternatives because we agree that their vegetation, fuels, and road management, and watershed improvement activities would result in more resilient forest conditions and improved water quality and aquatic habitats compared to the no action alternative.

Between the two action alternatives, we believe Alternative 3 would be environmentally preferable. Alternative 3 is environmentally preferable for the following reasons:

- Alternative 3's road management (including 104 miles of road decommissioning) would decrease known sediment contributions from roads by over 74%, as compared to 65% for Alternative 2. We also note our agreement with the EIS that the action alternatives' road decommissioning, road reconstruction and other activities would meet the intent of the November 2001 North Fork Coeur d'Alene River Total Maximum Daily Load for the Beaver Creek subbasin.
- Alternative 3's watershed improvement activities (including 12 aquatic organism passage repairs) would result in over 9 additional miles of stream available to fish, as compared to 4.5 miles for Alternative 2.
- Alternative 3's vegetation management activities (including 360 acres of aggregate retention) would result in, for example, improved effects on elk habitat quality. We generally recognize Alternative 3's inclusion of both aggregated and dispersed retention, as compared to just dispersed retention for Alternative 2, as environmentally preferable because we believe reflecting natural disturbance patterns requires flexibility in retention patterns. We encourage the your

efforts to use aggregated retention to improve wildlife connectivity; retain biological legacies; leave soft snags, the forest floor and understory intact; and, increase light for shade intolerant species.

Based on our review we have assigned the DEIS a rating of LO (Lack of Objections). A copy of the EPA rating system is also enclosed. We appreciate this opportunity to comment at this stage of the analysis process. If you have any questions or concerns please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Erik Peterson of my staff at (206)-553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosures:

EPA Rating System for Draft Environmental Impact Statements

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February,